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December 13, 2005

**VIA UPS OVERNIGHT**

The Honorable Ron Jones  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

Re: Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. –  
Docket No. 05-00165

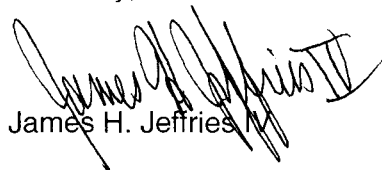
Dear Chairman Jones:

Pursuant to the procedural schedule established in this proceeding and Tenn. Comp. R. and Reg. 1220-1-1-2-.11, Nashville Gas Company respectfully submits a copy of the Responses of Nashville Gas Company to the Consumer Advocate and Protection Division's Requests for Admission.

Please accept these Responses for filing and return one filed-stamped copy of this letter to me in the enclosed self-addressed and stamped envelope.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,



James H. Jeffries

JHJ/bao

Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**December 13, 2005**

**IN RE:**

**REVIEW OF NASHVILLE GAS COMPANY'S                    )       DOCKET NO. 05-00165**  
**IPA RELATING TO ASSET MANAGEMENT FEES        )**

**RESPONSES OF NASHVILLE GAS COMPANY,  
A DIVISION OF PIEDMONT NATURAL GAS COMPANY, INC.,  
TO THE CONSUMER ADVOCATE AND PROTECTION DIVISION'S  
REQUESTS FOR ADMISSION**

Nashville Gas Company, a Division of Piedmont Natural Gas Company, Inc. ("Nashville Gas" or "Company"), pursuant to the Tennessee Regulatory Authority's November 28, 2005, *Order Establishing Procedural Schedule* and Tenn. Comp. R. and Reg. 1220-1-1-2-.11, respectfully submits the following responses to the Consumer Advocate and Protection Division's Requests for Admission.

**NASHVILLE GAS COMPANY  
REVIEW OF NASHVILLE GAS COMPANY'S IPA  
RELATING TO ASSET MANAGEMENT FEES  
DOCKET NO. 05-00165  
CONSUMER ADVOCATE AND PROTECTION DIVISION  
REQUESTS FOR ADMISSION  
November 14, 2005**

**REQUEST FOR ADMISSION NO. 1:** As of April 21, 1999, Piedmont subscribed to and managed more than 1.2 million dekatherms per day of peak-day and upstream transportation and storage capacity on nine interstate natural gas pipelines.

**RESPONSE:** Denied.

**NASHVILLE GAS COMPANY  
REVIEW OF NASHVILLE GAS COMPANY'S IPA  
RELATING TO ASSET MANAGEMENT FEES  
DOCKET NO. 05-00165  
CONSUMER ADVOCATE AND PROTECTION DIVISION  
REQUESTS FOR ADMISSION  
November 14, 2005**

**REQUEST FOR ADMISSION NO. 2:** As of April 21, 1999 Piedmont had wide-ranging participation in the interstate natural gas market and was an active participant in the secondary markets for interstate natural gas pipeline capacity and regularly engaged (as both buyer and seller) in capacity release transactions.

**RESPONSE:** Nashville Gas objects to this request for admission on the grounds that it is vague and indefinite inasmuch as the term wide-ranging is undefined. Without waiving this objection, Nashville Gas admits that as of April, 1999 Piedmont participated in the interstate market for natural gas and also participated in capacity release transactions as buyer and seller.

**NASHVILLE GAS COMPANY  
REVIEW OF NASHVILLE GAS COMPANY'S IPA  
RELATING TO ASSET MANAGEMENT FEES  
DOCKET NO. 05-00165  
CONSUMER ADVOCATE AND PROTECTION DIVISION  
REQUESTS FOR ADMISSION  
November 14, 2005**

**REQUEST FOR ADMISSION NO. 3:** As of April 21, 1999 Piedmont had not utilized an asset manager for the purpose of implementing the capacity management function.

**RESPONSE:** Denied.

**NASHVILLE GAS COMPANY  
REVIEW OF NASHVILLE GAS COMPANY'S IPA  
RELATING TO ASSET MANAGEMENT FEES  
DOCKET NO. 05-00165  
CONSUMER ADVOCATE AND PROTECTION DIVISION  
REQUESTS FOR ADMISSION  
November 14, 2005**

**REQUEST FOR ADMISSION NO. 4:** Capacity release transactions were largely automated by April 1999, and the automation had wrung most inefficiencies out of the wholesale market.

**RESPONSE:** Denied.

STATE OF NORTH CAROLINA  
COUNTY OF MECKLENBURG

**VERIFICATION**

Bill R. Morris, being duly sworn, deposes and says that he is Director of Financial Planning and Rates of Piedmont Natural Gas Company, Inc., that as such, he has read the foregoing Responses and knows the contents thereof; that the same are true of his own knowledge except as to those matters stated on information and belief and as to those he believes them to be true.

  
\_\_\_\_\_  
Bill R. Morris

Sworn to and subscribed before me  
this the 13 day of  
December, 2005.

  
\_\_\_\_\_  
Notary Public

My Commission Expires:

**MY COMMISSION EXPIRES 10-29-10**

\_\_\_\_\_

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the *Responses of Nashville Gas Company, A Division of Piedmont Natural Gas Company, Inc., to the Consumer Advocate and Protection Division's Requests for Admission* is being served upon the parties in this action either by hand delivery or by UPS overnight delivery addressed as follows:

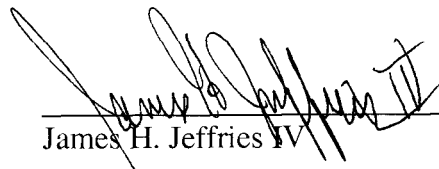
Bill R. Morris  
Director of Financial Planning and Rates  
Piedmont Natural Gas Company, Inc.  
P.O. Box 33068  
Charlotte, NC 28233

David Carpenter  
Director – Rates  
Piedmont Natural Gas Company, Inc.  
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Nashville, Tennessee 37243-0505

R. Dale Grimes, Esq.  
Bass, Berry & Sims PLC  
AmSouth Center  
315 Deaderick Street, Suite 2700  
Nashville, Tennessee 37238

This the 13th day of December, 2005.

  
James H. Jeffries IV